



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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January 25, 1996

Mr. P.F.X. Dunigan, Jr.
U.S. Department of Energy
P. O. Box 550 MSIN: A3-15
Richland, WA 99352

Dear Mr. Dunigan:

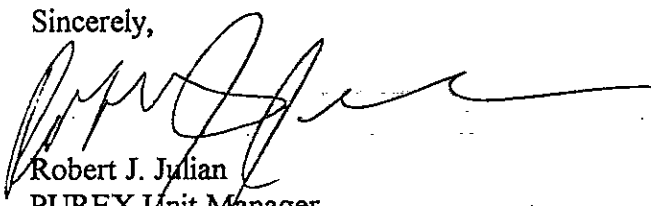
Re: Letter, P.F.X. Dunigan, Jr., to Michael Wilson, Ecology, PUREX Deactivation
End Points, Revision 1

The attached Review Comment Response Table lists the Washington State Department of Ecology's comments regarding Draft Revision 1 and the released Revision 1 transmitted on December 22, 1995.

The goal of our review was to ensure deactivation end points result in the facility being in the best possible configuration for future Decontamination and Decommissioning work. All comments have been closed out as being acceptable.

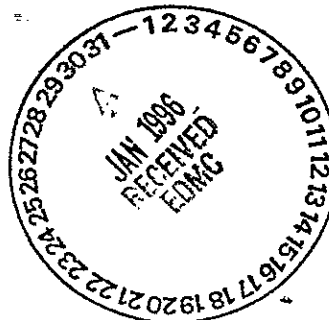
If you have any questions, please call me at (509) 736-5702.

Sincerely,


Robert J. Julian
PUREX Unit Manager
Nuclear Waste Program

RJ:mf

cc: Doug Sherwood, EPA
Ronald J. Bliss, WHC
Roger Bowman, WHC
Sue Price, WHC
Administrative Record



PUREX DEACTIVATION END POINT CRITERIA
WHC-SD-TPP-053
REVIEW COMMENT RESPONSE TABLE

<u>No.</u>	<u>Comment/Response</u>
1. <u>Preface: Page 4, first bullet:</u> <i>"Every end point decision should be driven by, and clearly linked to, top-tier objectives, not by feasibility or capability," while on page 4, the fifth bullet states, "To be workable, end points must be:</i> <i>- feasible and practical."</i>	<p>Comment: The two statements do not agree.</p> <p>Requirement: The two statements should agree, not lead the reader to the idea that you do not start out trying to be feasible while forming end points, but then ensure the end points must be feasible.</p> <p>Draft Rev 1 Update: Acceptable - Rewording has alleviated the disagreement.</p>
2. <u>Preface: Page 4, sixth bullet:</u> <i>"Therefore, end points should not be driven by D&D presumptions." while in V., 1. on page 5 states "Every end point is driven . . . which will then form the basic criteria for the end points. . . . they are:</i> <i>- Facilitating the ultimate D&D Work"</i>	<p>Comment: The two statements do not agree.</p> <p>Requirement: The two statements should agree.</p> <p>Draft Rev 1 Update: Acceptable - Rewording has alleviated the disagreement.</p>
3. <u>Preface: Page 12, Definitions</u>	<p>Comment: Throughout the document various "Task Areas" are used but the reader does not know what they are.</p> <p>Requirement: There is a need for a definition of "Task Areas."</p> <p>Draft Rev 1 Update: Acceptable - Definitions have been added.</p>
4. <u>Internal Spaces, Routine Access Required, Case 1, Page 21:</u> <i>"Identify these locations in the turnover package."</i>	<p>Comment: This is not an action of "Contamination."</p> <p>Requirement: Make this an action of "Document and Label."</p> <p>Draft Rev 1 Update: Acceptable - Rewording is acceptable.</p>
5. <u>Internal Spaces, Routine Access Required, Case 1, Page 24:</u> <i>"Furnish lighting electrical supply drawings as part of the turnover package."</i>	<p>Comment: This is not an action of "Monitor and Control."</p>

No.	Comment/Response
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Requirement: Make this an action of "Document and Label."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

6. PUREX SPECIFIC END POINT CRITERIA, CASE 1, Page 54: *"Seal gaps in wall leading to canyon." and "Seal (plug) floor drains."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

7. PUREX SPECIFIC END POINT CRITERIA, CASE 1, Page 57 and 71: *"Remove cages and other storage provisions (ALEA)."*

Comment: This is not an action of "Waste."

Requirement: Add to the statement to show there is hazardous waste in the storage provisions or move it to "Refurbish or Install."

Draft Rev 1 Update: Acceptable - Definition of Waste (TA-4) covers the action.

8. PUREX SPECIFIC END POINT CRITERIA, CASE 1, Page 61: *"Plug floor drains."*

Comment: This is not an action of "Monitor and Control."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Not acceptable - Definition of Monitor and Control (TA-6) still does not cover the action.

PUREX Rev 1 Response: The intent or WHY you are plugging the floor drains drives the assignment under Monitor and Control versus Isolate and Contain. This is a basic concept of the End Point development process. Activities must be driven by an Objective or they are not performed. This activity supports facility monitoring by localizing any potential buildup of solution for identification during performance of the quarterly surveillance. The End Point will be modified to show this (i.e., plug floor drains to localize potential buildup of solution).

9. PUREX SPECIFIC END POINT CRITERIA, CASE 1, Page 61: *"Plug floor drains."*

Comment: This is not an action of "Monitor and Control."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Definition of Contamination (TA-3) covers the action.

10. PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 100: *"Empty all bays of excess material."*

Comment: This material may not be "waste."

<u>No.</u>	<u>Comment/Response</u>
	Requirement: Change to read, "Empty all bays of excess <u>waste</u> material."
	Draft Rev 1 Update: Acceptable - Action removed from criteria.
11.	<u>PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 127:</u> <i>"Provide space lighting."</i>
	Comment: This is not an action of "Isolate and Contain."
	Requirement: Make this an action of "Refurbish or Install."
	Draft Rev 1 Update: Acceptable - Action removed from criteria.
12.	<u>PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 142:</u> <i>"Remove water under Tk-U8."</i>
	Comment: This is not an action of "Hazards."
	Requirement: Make this an action of "Contamination" or "Waste."
	Draft Rev 1 Update: Acceptable - Definition of Hazards (TA-1) covers the action.
13.	<u>PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 144:</u> <i>"Provide space lighting."</i>
	Comment: This is not an action of "Monitor and Control."
	Requirement: Make this an action of "Refurbish or Install."
	Draft Rev 1 Update: Acceptable - Definition of Monitor and Control (TA-6) covers the action.
14.	<u>PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 173:</u> <i>"Isolate open gap, above funnel, of CSL line." and "Seal access doors."</i>
	Comment: This is not an action of "Contamination."
	Requirement: Make this an action of "Isolate and Contain."
	Draft Rev 1 Update: Acceptable - Action removed from criteria.
15.	<u>PUREX SPECIFIC END POINT CRITERIA, CASE 2, Page 174:</u> <i>"Provide space lighting." and "Remove doors to manipulator shop."</i>
	Comment: These are not actions of "Monitor and Control."
	Requirement: Make them actions of "Refurbish or Install."
	Draft Rev 1 Update: Acceptable - Actions removed from criteria.
16.	<u>External Spaces, Including Exterior Envelopes, Case 3, Page 194:</u> <i>"Include survey requirements as part of turnover package to ensure containment of outside Contamination Area (CA)."</i>

No.	Comment/Response
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Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Document and Label."

Draft Rev 1 Update: Acceptable - Definition of Contamination (TA-3) covers the action.

17 PUREX SPECIFIC END POINT CRITERIA, CASE 3, Page 204: *"Include roof studies and any limitations in the turnover package."*

Comment: This is not an action of "Isolate and Contain."

Requirement: Make this an action of "Document and Label."

Draft Rev 1 Update: Not acceptable - Definition of Isolate and Contain (TA-5) still does not cover the action.

PUREX Rev 1 Response: Agree, TA-8 Document and Label, includes the End Point to insert the documentation of the activity in the Turnover Package. References to documentation will be deleted from TA-5 Isolate and Contain.

18. PUREX SPECIFIC END POINT CRITERIA, CASE 3, Page 213: *"Remove monitoring equipment."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Refurbish or Install."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

19. PUREX SPECIFIC END POINT CRITERIA, CASE 3, Page 213: *"Cap stack 296-A-14."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

20. PUREX SPECIFIC END POINT CRITERIA, CASE 3, Page 217, 223, 224, 225, and 226

Comment: What are "PUREX books"?

Requirement: If they are real books, then this should be "Document and Label."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

21. System - Operational, Case 4, Page 234: *"Include administrative controls in the turnover package" and "Identify electrical supply in the turnover package."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Document and Label."

No.	Comment/Response
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Draft Rev 1 Update: Acceptable - Action removed from criteria.

22. System - Operational, Case 4, Page 237: *"Identify accumulation areas for waste generated by operational systems and include in the turnover package (i.e., general waste awaiting characterization and designation)."*

Comment: This is not an action of "Waste."

Requirement: Make this an action of "Document and Label" or "Waste."

Draft Rev 1 Update: Acceptable - Definition of Waste (TA-4) covers the action.

23. System - Operational, Case 4, Page 239: *"Provide lighting capabilities to facilitate S&M."*

Comment: This is not an action of "Monitor and Control."

Requirement: Make this an action of "Refurbish or Install"

and

"Define system calibration and preventative maintenance requirements in turnover package."

Comment: This is not an action of "Monitor and Control."

Requirement: Make this an action of "Document and Label."

Draft Rev 1 Update: Acceptable - Definition of Monitor and Control (TA-6) covers the action.

24. PUREX SPECIFIC END POINT CRITERIA, CASE 4, Page 243: *"Blank supply routings (branch D, H, B, and G)", "Blank U-Cell inlet ducts", and "Blank R-Cell inlet ducts."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

25. PUREX SPECIFIC END POINT CRITERIA, CASE 5, Page 265: *"Seal doors."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

26. PUREX SPECIFIC END POINT CRITERIA, CASE 5, Page 269: *"Seal doors to contaminated area(s)" and "Seal exterior door to PR elevator loft."*

Comment: This is not an action of "Contamination."

No.	Comment/Response
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Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

27. Systems - Abandoned in Place, Case 6 Page 283: *"Include administrative controls in the turnover package."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Document and Label."

Draft Rev 1 Update: Acceptable - Definition of Hazards (TA-1) covers the action.

28. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 308: *"Isolate vacuum and dry air lines to Sample Gallery."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

29. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 312, 320, 348, 379, 389, and 409: *"Remove monitoring equipment."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Refurbish or Install."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

30. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 317

Comment: Action statement is missing.

Requirement: Add "Verify chemical addition lines are drained."

Draft Rev 1 Update: Acceptable - Rewording is acceptable.

31. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 322: *"Document zirconium hulls remaining in dissolvers."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Document and Label."

and

Comment: What happened to "Identify mercury in thermowells"?

<u>No.</u>	<u>Comment/Response</u>
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Requirement: Add "Remove mercury from thermowells."

Draft Rev 1 Update: The reviewer can not find Canyon A, B, and C Cells in Revision 1. Was it just left out or included in another area?

PUREX Rev 1 Response: Canyon A, B, C cells have been condensed into Case 2 "Canyon" for the specific space End Points. The associated vessels are included under the Case 6 titles of "Headend Vessels" and "Other Canyon Vessels". The document zirconium hulls and identify mercury in the thermowells are actions that are required by TPA M-80-08 and will be documented by the reference under TA-8 Meet Commitments to Stakeholders in Case 2 Canyon. The mercury in the thermowells is considered Installed and/or Inaccessible equipment and will be left in place per the Hanford Federal Facility Agreement and Consent Order.

32. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 342: *"Isolate water add to Tk-U8."*

Comment: This is not a sentence.

Requirement: Make it a sentence.

Draft Rev 1 Update: Acceptable - Action removed from criteria.

33. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 347: *"Fix/isolate radiation contamination in exhaust ducting."* and *"Seal the open face of hoods."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Definition of Contamination (TA-3) covers the action.

34. PUREX SPECIFIC END POINT CRITERIA, CASE 6

Comment: "N Cell Room Exhaust," Draft page 352 is missing in this revision.

Requirement: Add it to this revision.

Draft Rev 1 Update: Acceptable - Added to Rev 1.

35. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 362: *"Remove monitoring equipment."*

Comment: This is not an action of "Document and Label."

Requirement: Make this an action of "Refurbish or Install."

Draft Rev 1 Update: Acceptable - Action removed from criteria.

36. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 364: *"Remove titanium dioxide filters in L9-glovebox (F-L9-1 and F-L9-2)."*

Comment: This is not an action of "Radiation Fields."

No. Comment/Response

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Definition of Radiation Fields (TA-2) covers the action.

37. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 395: *"Isolate sanitary water from the 200E header."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Definition of Hazards (TA-1) covers the action.

38. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 404: *"Isolate raw water from the south loop header" and "Isolate raw water from the north loop header."*

Comment: This is not an action of "Hazards."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Definition of Hazards (TA-1) covers the action.

39. PUREX SPECIFIC END POINT CRITERIA, CASE 6, Page 408: *"Seal glove box and fix internal contamination (3A-3B Pulser)."*

Comment: This is not an action of "Contamination."

Requirement: Make this an action of "Isolate and Contain."

Draft Rev 1 Update: Acceptable - Has been moved in Rev 1.

COMMENTS AGAINST REVISION 1

40. TABLE OF CONTENTS:

Comment: There are numbers in parenthesis (#) from page ii to page xii, but no definition why they exist. It appears the number signifies the Case.

Requirement: Explain what these numbers mean.

PUREX Rev 1 Response: Agree, explanation will be included in the Table of Contents.

Rev 1 Update: Acceptable - Rev 1 has change.

41. III. Introduction, Page 2:

Comment: Typo - Between the second and third paragraph, there is no line.

Requirement: Add a line.

<u>No.</u>	<u>Comment/Response</u>
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PUREX Rev 1 Response: Agree, line will be inserted.

Rev 1 Update: Acceptable - Rev 1 has change.

42. IV. End Point Principles, Page 3, third bullet:

Comment: Last sentence has an extra word.

Requirement: Delete the word "the."

PUREX Rev 1 Response: Agree, the correction will be made.

Rev 1 Update: Acceptable - Rev 1 has change.

43. TA-1, Hazards, Page 4:

Comment: In the last sentence, the closing parentheses is in the wrong place.

Requirement: Delete the ")“ at the end of the sentence and put after the word "Spaces."

PUREX Rev 1 Response: Agree, the correction will be made.

Rev 1 Update: Acceptable - Rev 1 has change.

44. TA-2, Radiation Fields, Page 4:

Comment: The first sentence is awkward.

Requirement: Add the word "during" before "both deactivation and S&M."

PUREX Rev 1 Response: The referenced section refers to both the deactivation worker and surveillance worker. The definition will be modified to "... supports ALARA practices and protects both deactivation and S&M workers while performing activities throughout the facility."

Rev 1 Update: Acceptable - Rev 1 has change.

45. TA-3, Contamination, Page 4:

Comment: The first sentence is awkward.

Requirement: Add the word "during" before "both deactivation and S&M."

PUREX Rev 1 Response: The referenced section refers to both the deactivation worker and surveillance worker. The definition will be modified to "... supports ALARA practices and protects both deactivation and S&M workers while performing activities throughout the facility."

Rev 1 Update: Acceptable - Rev 1 has change.

No. Comment/Response

46. 4. Integration of Objectives, Tasks and the Six Cases, Page 6, last paragraph:

Comment: Need parentheses in the first sentence and “.’s in “i.e.”.

Requirement: Rewrite as: ... identified, (i.e. radiological posting requirements).

PUREX Rev 1 Response: Agree, changes will be incorporated.

Rev 1 Update: Acceptable - Rev 1 has change.

47. 4. Integration of Objectives, Tasks and the Six Cases, Page 6, last paragraph:

Comment: Typo - Between the last and next to last paragraph there is no line.

Requirement: Add a line.

PUREX Rev 1 Response: Agree, changes will be incorporated.

Rev 1 Update: Acceptable - Rev 1 has change.

48. Administrative End Points and Turnover Package, Page 14, first paragraph:

Comment: Word “A” is used incorrectly and there are no lines between paragraphs.

Requirement: Change “A End Point . . .” to “An End Point . . .” Add lines between paragraphs.

PUREX Rev 1 Response: Agree, changes will be incorporated.

Rev 1 Update: Acceptable - Rev 1 has change.

49. Pages 20,29, 39, 49, 58, and 66:

Comment: One can locate “Level I and Level III end point criteria but not “Level II.”

Requirement: Add “(Level II)” to each page.

PUREX Rev 1 Response: A Level II cover page will be inserted to assist in the separation of the document.

Rev 1 Update: Acceptable - Rev 1 has change.

50. Pages 55, 63 and 75, Document and Label:

Comment: The criteria does not provide for a radiation and contamination levels survey report and map.

Requirement: Add “Document space dose rates and contamination levels in the final radiological survey report and map per Hanford Site Radiological Control Manual (HSRCM-1), Chapter 5, Rev. 2 (Ref. EPTI #6) for inclusion in the turnover package.”

No.

Comment/Response

PUREX Rev 1 Response: All systems are physically located within a designated space. Final surveys and maps will be generated in the specific space the system is located in. The Case 1, 2, and 3 criteria will be re-worded to reflect this.

Rev 1 Update: Acceptable - Rev 1 has change.

51. Comment: A number of spaces/systems have the same title but appear a second or third time with a different case. For 292-AB Case 4 comes before Case 3.

Requirement: Rename one, and in the case of 292-AB two, of the spaces/systems. Interchange 292-AB Case 4 and Case 3.

212-A (2) page 172

212-A (3) page 179

213-A (2) page 185

213-A (3) page 189

291-AE (1) page 255

291-AE (3) page 264

292-AB (1) page 280

292-AB (4) page 285

292-AB (3) page 289

294-A (2) page 316

294-A (6) page 321

Badgehouse (2) page 326

Badgehouse (3) page 330

R-Cell (2) page 721

R-Cell (3) page 732

PUREX Rev 1 Response: 292-AB designates the common name of the space or system. The (# 1-6) identifies the specific case designation. The order the case is listed in the Table of Contents is based on the systems relationship to the space i.e. 292-AB Case 4 (4) Operational Equipment is located within the 292-AB Case 1 (1). Also, this is shown by the format (indents) in the Table of Contents. Additional information for the commented sections will be included to assist in the separation of the cases.

Rev 1 Update: Acceptable - Rev 1 has change.

52. Comment: In numerous places there are instances of a space/system having a criteria for "Radiation Fields" but no criteria for "Contamination." In places there is criteria for rad/contamination mapping in Document and Label, but no criteria for Radiation Fields or Contamination. There are also places where criteria exists for Radiation Fields and Contamination but no rad/contamination mapping in Document and Label. It appears the conditions are such that if the contamination is enclosed in an object (room, tank, glovebox, etc.), criteria for Contamination was not included. Since this document will be used for Surveillance and Maintenance and by the D&D contractor, it is obvious employees should have an indication (posting) letting them know what levels/types of contamination they might run

No.Comment/Response

into if the enclosure should breach. The reviewer could find no logical reason for not including rad/contamination mapping in Document and Label if there was a criteria for Radiation Fields and Contamination.

Requirement: The following spaces/systems need to have "Radiation Fields" or "Contamination" or rad/contamination survey reports and maps added to.

Page	Space/System	Need to be added			Case
		Radiation Fields	Contamination	Rad/Contamination Map	
84	151 Diversion Box Equipment			Yes	6
117	303-A Control Room & Pump House Equipment			Yes	6
134	203-A Truck Pad Piping			Yes	6
144	Fractionator Equipment			Yes	6
163	211-A Exterior		Yes		6
170	211-A Exterior Piping			Yes	6
185	213A	Yes			2
197	A/B214-/C&D	Yes	Yes	OR Delete	2
213	216-A-42A Pump Station			Yes	6
217	216-A-42B Valve Box			Yes	6
221	216-A-42C Valve Box			Yes	6
225	216-A-42D Diversion Box			Yes	6
229	216-A-42E Diversion Box			Yes	6
238	Steam Turbine			Yes	6
249	291-AD	Yes	Yes	OR Delete	2
253	291-AD Monitoring Equipment			Yes	6
263	291-AE Filters			Yes	4
278	291-AH Monitoring Equipment			Yes	6
286	292-AB			Yes	4
304	293-A Equipment			Yes	6
324	294-A			Yes	6
343	2711-A & 2712-A Equipment			Yes	6
349	2714-U Shed		Yes		2
364	AMU	Yes			1
387	ASD System			Yes	6
409	East Crane			Yes	5
412	Slave Crane			Yes	5
416	West Crane			Yes	5
428	Canyon Pool Cell & Slug Storage Basin			yes	6
450	Change Rooms	Yes	Yes	OR Delete	1
461	Head End, Central Power Control Rooms & Offices	Yes			1
492	CSL System			Yes	2
506	CWL System			Yes	6
534	Lab Center Corridor & Change/Lunch Rooms	Yes	Yes	OR Delete	1
545	Lab HVAC Equipment			Yes	6
549	Lab ICP Filter			Yes	6

<u>No.</u>	<u>Comment/Response</u>				
560	Lab Counting Room Equipment			Yes	6
565	Lab Hoods			Yes	6
576	Loading Docks	Yes	Yes	OR Delete	3
612	N-Cell Gloveboxes			Yes	6
615	N-Cell Exhaust			Yes	6
632	PDD System			Yes	6
658	P&O Gallery Systems			Yes	6
679	PR-Room Exhaust			Yes	6
685	PR-Room Gloveboxes			Yes	6
702	Q-Cell Gloveboxes			Yes	6
731	R-Cell Equipment			Yes	6
743	Railroad Storage Tunnels #1 & #2 Exhaust Fans			Yes	6
752	Water filled Doors			Yes	6
767	Sample Gallery Chemical Headers			Yes	6
771	Sample Gallery Decon Hood			Yes	6
774	Sample Gallery Hood HVAC			Yes	6
778	Sample Gallery Hood HVAC Station			Yes	6
782	Sample Gallery Iodine Monitors			Yes	6
785	Sample Gallery Loading Hoods			Yes	6
788	Sample Gallery N-Cell Halon Fire System			Yes	6
792	Sample Gallery N-Cell Vacuum Pump			Yes	6
793	Sample Gallery PDD Neutralization			Yes	6
800	Sample Gallery Room Exhaust			Yes	6
804	Sample Gallery Samplers			Yes	6
808	Sample Gallery Waste Compactor			Yes	6
820	SCD System			Yes	6
829	Storage Gallery	Yes			1
845	U-Cell Equipment			Yes	6
878	White Room HVAC			Yes	6
882	White Room Systems			Yes	6
907	202-A Ventilation			Yes	4
913	Facility Off-Gas condensate Catch Tanks			Yes	4
919	PR Elevator			Yes	5
927	FH-V11-1 (#1 Filter)			Yes	6
930	FH-V11-1 (#2 Filter)			Yes	6

PUREX Rev 1 Response: For comments applicable to cases 4, 5, and 6, all systems are physically located within a designated space. Radiological status including final surveys and maps will be generated in the specific space the system (Cases 4, 5, and 6) is located in. A reasonable effort to give an indication of contamination/dose levels within the tanks/piping/gloveboxes will be considered during the performance of the Final Radiological Survey. The pages showing the applicable sections questioned for 213-A, 291-AD, 2714-U, CSL System, and the Storage Gallery currently exist in the document but did not get included in your review copy. These pages have been made available per your request. Deletions to sections for 214-A/B/C/D and the Changerooms have been completed since these areas do not have any radiological conditions. Task Area 2 Radiation Fields is not applicable to the AMU and Headend, Controlroom, Offices sections based on the current requirements of the Hanford Site Radcon Manuals minimum

<u>No.</u>	<u>Comment/Response</u>
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posting limit of .005Rem (5 mrem/hr). In addition, the Loading Docks radiological reference has been moved to another section.

Rev 1 Update: Acceptable - Rev 1 has change.

53. Page 363, AMU, Monitor & Control: *Isolate Floor drains and Tape/seal pipe shaft access doors (one each floor and access to Tk-113).*

Comment: These actions are not functions of "Monitor and Control" even under the new definitions in Rev 1.

Requirement: Make this an action of "Isolate and Contain."

PUREX Rev 1 Response: The intent or WHY you are plugging the floor drains drives the assignment under Monitor and Control versus Isolate and Contain. This activity supports facility monitoring by localizing any potential buildup of solution for identification during performance of the quarterly surveillance. The End Point will be modified to clarify the WHY. The Tape/seal pipe shaft access doors End Point has been moved to TA-3 Contamination and wording added to clarify.

Rev 1 Update: Acceptable - Rev 1 has change.

54. Page 443, Canyon Lobby, Monitor & Control: *Secure storage room door in the open position.*

Comment: These actions are not functions of "Monitor and Control" even under the new definitions in Rev 1.

Requirement: Make this an action of "Refurbish or Install."

PUREX Rev 1 Response: The intent or WHY you are securing the door open drives the assignment under Monitor and Control versus Refurbish and Install. This is just a large closet door and by blocking it open you prevent any doubts on what is behind or in there. The end point will be reworded to clarified and define the WHY.

Rev 1 Update: Acceptable - Rev 1 has change.